

**Abbott GmbH & Co., et al. v. Centocor Ortho Biotech, Inc., et al. No. 4:09-cv-11340-FDS****PROPOSED PRE-TRIAL SCHEDULE**

<b>Date</b>	<b>Event</b>
June 15, 2012 or one week after ruling on request for reconsideration, whichever date is later	Abbott discloses which patent claims it will pursue at trial
July 22, 2012 or one week after Abbott's disclosure of patent claims it will pursue at trial, whichever date is later	Centocor discloses which defenses and counterclaims it will pursue at trial
June 29, 2012	Daubert motions due  Deadline for supplementing discovery relevant to damages
July 13, 2012	Oppositions to Daubert motions due  Abbott serves supplemental damages expert report to reflect updated damages discovery
July 27	Replies to Daubert motions due  Centocor serves damages expert report responsive to Abbott supplemental report
July 30, 2012	Status conference
August 3, 2012	All pretrial filings exchanged between the parties: a) voir dire questions, b) jury instructions, c) witness/exhibit lists, d) proposed verdict form, e) deposition designations.  Deadline for filing in limine motions.
August 10, 2012	Exchange counter deposition designations, objections to deposition designations, objections to exhibits/witnesses, amendments to exhibit/witness lists, and objections to jury instructions.  Oppositions to Aug. 3 motions in limine motions filed.

August 17, 2012	Parties meet and confer to jointly prepare Joint Pre-trial Memo
August 24, 2012	<p>Joint Pre-trial Memo due, including (1) concise summary of evidence of each side (liability and damages), (2) facts established by the pleadings, by admission or by stipulation (counsel shall stipulate all facts not in genuine dispute), (3) contested issues of fact, (4) jurisdictional questions, (5) any questions raised by pending motions, (6) issues of law, including evidentiary questions, with supporting authority, (7) any requested amendments to the pleadings, (8) any additional matters to aid in the disposition of the action, (9) probable length of trial, (10) names, addresses, and telephone numbers of witnesses to be called, the purpose of the testimony, and whether testimony of such witness is intended to be presented by deposition, (11) proposed exhibits, (12) positions on objections to witnesses.</p> <p>Each party shall file a trial brief that includes:  (1) any proposed questions for the voir dire examination of the jury; (2) requests for instructions to the jury with citation to supporting authority; and (3) any proposed interrogatories or special verdict form.</p>
August 31, 2012	Final pretrial conference
September 10, 2012	Jury trial begins